

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

THOMAS C. GOLDSTEIN,

Defendant

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CRIMINAL NO. LKG-25-6

MOTION TO UNSEAL

The United States of America, by and through undersigned counsel, respectfully moves the Court for an order partially unsealing the Government's *Ex Parte* Motion Under 18 U.S.C. § 3148 for Arrest Warrant and Revocation of Release Order ("*Ex Parte* Motion"), and unsealing the Court's Order granting the Government's *Ex Parte* Motion and the arrest warrant. Defendant has been arrested and a bail review hearing has been scheduled for 2:30 pm on February 10, 2025 before Chief Magistrate Judge Sullivan. Given that Defendant is now aware of the *Ex Parte* Motion and is in custody, and because the Government will be utilizing the information and exhibits contained in the *Ex Parte* Motion during the hearing, there is no longer a need to keep the *Ex Parte* Motion, Order, and arrest warrant under seal.

However, the *Ex Parte* Motion and exhibits contain tax return information and sensitive personal information. Under the Protective Order in this case (ECF 29), a proposed redacted version of the *Ex Parte* Motion and exhibits are attached for public filing, removing the tax return information and sensitive personal information.

WHEREFORE, the Government requests that the Government's *Ex Parte* Motion and exhibits be partially unsealed, and the Court's Order and arrest warrant regarding the same be unsealed.

Respectfully submitted,

Erek L. Barron
United States Attorney

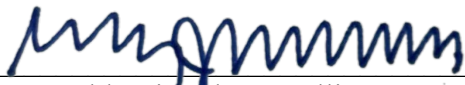
/s/

Patrick D. Kibbe
Assistant United States Attorney
District of Maryland

Stanley J. Okula, Jr.
Senior Litigation Counsel
Department of Justice—Tax Division

Emerson Gordon-Marvin
Hayter Whitman
Trial Attorneys
Department of Justice—Tax Division

ORDERED as prayed, this 10th day of February, 2025.



Honorable Timothy J. Sullivan
Chief United States Magistrate Judge